

REMARKS/ARGUMENTS

Reconsideration of this application in light of the foregoing amendments and following comments is courteously solicited.

Initially, it should be noted that the Examiner objected to the specification as set forth on page 2, paragraph 1 of her Office action. Obviously, the Examiner has not looked at the substitute specification which was filed in conjunction with the filing of the instant application. The Examiner is requested to acknowledge receipt of the substitute specification.

With regard to the rejection of previously submitted claims under 35 U.S.C. 102(b) as being anticipated by Bachman ('642), Applicants submit that as to how this rejection applies to the claims as amended herein, it is respectfully traversed. New independent claim 40 sets forth with specificity the device of the present invention for actuating doors. Independent claim 40 sets forth a structure which allows for sequential rotation about an axis M and thereafter linear movement in a direction X and vice versa. Independent claim 40 sets forth the coupling elements and the link means for accomplishing the foregoing. The prior art patent to Bachman does not show, disclose nor render obvious the subject matter of independent claim 40. There is no sequential movement as claimed in the '642 reference nor is there any structure to accomplish the foregoing.

Applicants submit that claim 40 and the claims which depend therefrom patentably define over the art of record and an early indication of same is respectfully requested.

An earnest and thorough attempt has been made by the undersigned to resolve the outstanding issues in this case and place same in condition for allowance. If the Examiner has any questions or feels that a telephone or personal interview would be

helpful in resolving any outstanding issues which remain in this application after consideration of this amendment, the Examiner is courteously invited to telephone the undersigned and the same would be gratefully appreciated.

If any fees are required in connection with this case, it is respectfully requested that they be charged to Deposit Account No. 02-0184.

Respectfully submitted,

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